

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE  
PERIOD APRIL 4, 2023 THROUGH APRIL 30, 2023**

Debtor: LTL Management LLC

Applicant: Wollmuth Maher & Deutsch LLP

Case No.: 23-12825-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: April 4, 2023 (the "Petition  
Date")

---

**SECTION 1  
FEE SUMMARY**

X Monthly Fee Statement No. 1                      or    ☐ Final Fee Application

Summary of Amounts Requested for the Period from April 4, 2023 through April 30, 2023 (the "First Statement Period").

Total Fees:	\$371,261.00
Total Disbursements:	\$2,348.76
Total Fees Plus Disbursements:	\$373,609.76
Minus 20% Holdback of Fees:	\$74,252.20
Amount Sought at this Time:	\$299,357.56

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	\$0	\$0
Total Fees Allowed to Date:	\$0	\$0
Total Retainer (If Applicable):	\$0	\$0
Total Holdback (If Applicable):	\$0	\$0
Total Received by Applicant:	\$0	\$0

<b>Name of Professional &amp; Title</b>	<b>Year Admitted</b>	<b>Hours</b>	<b>Rate</b>	<b>Fees</b>
Paul R. DeFilippo, Esq., Partner	1978	74.8	\$975	\$70,102.50
James N. Lawlor, Esq., Partner	1992	125.9	\$910	\$114,569.00
Nicole C. Rende, Esq., Associate	2019	33.3	\$635	\$21,145.50
Joseph F. Pacelli, Esq., Associate	2020	138.1	\$635	\$85,788.50
Logan R. Leonard, Esq., Associate	2022	58.5	\$440	\$25,740.00
Stephanie A. Weaver, Esq., Associate	2023	89.2	\$440	\$39,248.00
Wesley Gibbs, Esq., Associate <sup>1</sup>	2023	6.1	\$355	\$2,165.50
Scarlet E. Meltzer, Paralegal	N/A	23.8	\$235	\$5,593.00
Celeyndiana Rodriguez, Paralegal	N/A	11.7	\$235	\$2,573.25
Alexander T. Cukier, Paralegal	N/A	20.2	\$235	\$4,335.75

---

<sup>1</sup> This timekeeper was a Law Clerk until April 17, 2023.

## SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEES
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.	0	0
b) <b>Asset Disposition:</b> Sales, leases, abandonment and related transaction work.	0	0
c) <b>Avoidance Action Litigation:</b> Preference and fraudulent transfer litigation.	0	0
d) <b>Business Operations:</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0	0
e) <b>Case Administration:</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	195.9	\$127,443.50
f) <b>Claims Administration and Objections:</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0	0
g) <b>Employee Benefits/Pensions:</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0	0
h) <b>Fee/Employment Applications:</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	54.1	\$34,594.00
i) <b>Fee/Employment Objections:</b> Review of an objections to the employment and fee applications of others.	2.5	\$1,639.50
j) <b>Financing:</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0	0
k) <b>Litigation:</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	216.6	\$144,346.50
l) <b>Meeting of Creditors:</b> Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.	27.0	\$12,936.00

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEES</b>
<b>m) Plan and Disclosure Statement:</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	55.9	\$34,871.50
<b>n) Relief from Stay Proceedings:</b> Matters relating to termination or continuation of automatic stay under 362.	12.8	\$10,110.00
<b>o) Accounting/Auditing:</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0	0
<b>p) Business Analysis:</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0	0
<b>q) Corporate Finance:</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0	0
<b>r) Data Analysis:</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0	0
<b>s) Litigation Consulting:</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0	0
<b>t) Reconstruction Accounting:</b> Reconstructing books and records from past transactions and bringing accounting current.	0	0
<b>u) Tax Issues:</b> Analysis of tax issues and preparation of state and federal tax returns.	0	0
<b>v) Valuation:</b> Appraise or review appraisals of assets.	0	0
<b>w) Travel Time</b>	16.8	\$5,320.00
<b>SERVICE TOTALS</b>	<b>581.6</b>	<b>\$371,261.00</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
04/04/2023 - JNL - Car Service Late Night	\$24.00
04/04/2023 - JFP - Late Night Meal	\$20.00
04/04/2023 - JNL - Late Night Dinner	\$21.00
04/11/2023 - JFP - Parking at Court	\$12.00
04/11/2023 - ATC - Breakfast purchased prior to LTL hearing	\$41.41
04/11/2023 - JFP - Travel from Court on 4/11 (46.8 mi. * \$0.34)	\$15.91
04/11/2023 - JFP - Travel to Court on 4/11 (46.8 mi. * \$0.34)	\$15.91
04/12/2023 - J & J Court Transcribers inv # 2023-00708 Transcript for 4/11/2023 hearing	\$1,288.65
04/18/2023 - CR - Breakfast purchased prior to 4/18 LTL hearing	\$57.57
04/18/2023 - JFP - Paper for 4/18 hearing	\$53.58
04/18/2023 - JFP - Travel from Court on 4/18 (46.8 mi. * \$0.34)	\$15.91
04/18/2023 - JFP - Travel to Court on 4/18 (46.8 mi. * \$0.34)	\$15.91
04/18/2023 - JFP - Parking at Court (2x)	\$24.00
04/18/2023 - CR - 4-18-2023 CR (Trenton to NYC)	\$291.46
04/18/2023 - CR - 4-18-2023 CR (NYC TO Trenton)	\$301.45
04/26/2023 - PHV admission payment of 1 attorney	\$150.00
<b>DISBURSEMENTS TOTALS</b>	<b>\$2,348.76</b>

**SECTION IV  
CASE HISTORY**

1. Date of Retention: June 14, 2023, effective as of April 4, 2023 [Dkt. 770] (the “Retention Order”).<sup>2</sup>
2. Summary explaining the nature of the work performed and the results achieved:
  - Facilitated the drafting, finalization and filing of several documents, including: (i) petition, (ii) first day motions and first day declaration, (iii) statement regarding refiling, (iv) amended list of top law firms with significant talc claims, (v) list of creditors who have the 20 largest unsecured claims, (vi) notice of commencement and meeting of creditors, (vii) adversary complaint and related motion for a temporary restraining order and preliminary injunction, (viii) motion and reply regarding future claims representative, (ix) motion regarding mediation procedures, (x) motion regarding satisfying obligations from prior case dismissal order, (xi) motion regarding service procedures and objection to direct certification in the adversary proceeding, (xii) deposition designations, motions to seal, and discovery letters regarding the preliminary injunction, (xiii) motion regarding disclosure statement deadlines, (xiv) applications to shorten time, (xv) opposition to lift stay motion, (xvi) notices of appearance and applications for admission *pro hac vice* for Debtor’s professionals in the main and adversary cases, and (xvii) hearing agendas;
  - Analyzed issues and counseled the Debtor with respect to, among other things, (i) retention of the Debtor’s professionals, (ii) recently opened chapter 11 case and adversary proceeding, (iii) mediation, and (iv) discovery;
  - Participated in the hearings and conferences held during this period, and counseled the Debtor with respect thereto;
  - Monitored main case and adversary proceeding dockets; and
  - Interfaced on a daily basis with the Debtor and/or its other professionals to facilitate the Debtor’s administrative processes, including adherence to the local bankruptcy rules and filing procedures.

I certify under penalty of perjury that the above is true.

Date: June 21, 2023

/s/ Paul R. DeFilippo  
Paul R. DeFilippo

---

<sup>2</sup> The Retention Order is attached hereto as Exhibit A.